

August 17, 1987

MEMORANDUM FOR: FILE

FROM: William J. Lazarus, Chief, Emergency Preparedness Section, NRC RI

SUBJECT: MEETING TO DISCUSS FEMA I SELF-INITIATED STUDY OF MASS RERP FOR
PI 3RIM ON AUGUST 14, 1987

A meeting was held in the FEMA Region I Office at 10 AM on August 14, 1987 at the request of Mr. Peter Agnes, Assistant Secretary of Public Safety to discuss the FEMA Region I Self-Initiated Review and Interim Finding dated August 4, 1987. In addition to myself, the following people were present:

- H. Vickers, FEMA I
- E. Thomas, FEMA I
- J. Dolan, FEMA I
- J. Quinlan, FEMA HQ
- R. Byrd, BECo
- R. Varley, BECo
- R. Silva, BECo
- P. Agnes, Mass. Dept. of Public Safety
- J. Lovering, Mass. Civil Defense
- B. Hausner, Mass. Civil Defense

The report had been released to the public the previous week and has generated considerable press interest, as it is very critical of the Commonwealth's lack of responsiveness to correcting identified RERP and exercise deficiencies. This appears to be the first indication that the public is becoming aware that the RERP is a Commonwealth responsibility and is not Boston Edison's plan.

At the meeting Mr. Agnes indicated that he wished to discuss some of the judgments in the report and correct some of the facts in the report. Specifically on the issue of correcting facts, he indicated that the Commonwealth had never stated that they would not use the resources of the MBTA for evacuation of people in the Pilgrim EPZ. After a lengthy discussion it was agreed that FEMA had misunderstood the state's position and that Mr. Agnes would document their willingness to use the resources of the MBTA in a letter to FEMA I. FEMA indicated that this will go a long way to closing some of their concerns about transportation resources. (There is apparently a high amount of press interest on this point.) Secondly, Mr. Agnes was concerned with the discussion of "terminating" or "suspending" the 44CFR350 review process. FEMA indicated that they had suspended the process because they had nothing to review. The state had not responded to the RAC comments from 1981 or the subsequent exercises and had not submitted their annual letters of certification regarding the adequacy of the plans. When there was something to review the process would continue. FEMA detailed what submittals were necessary to resume this process.

A judgement made in the FEMA report, that representatives of the Commonwealth have been unable to answer questions posed by the public and local officials at public meetings, and didn't understand the RERP, has apparently been taken as an insult by the Civil Defense personnel. The Commonwealth is very

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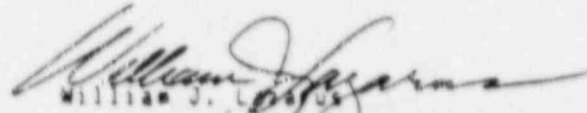
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sensitive on this issue but FEMA cited facts to back up their position and would not back down.

Mr. Agnes indicated that they have been instructed by the Governor to develop the "best possible plans" and that there would be "no foot dragging". To that end, they have met with Boston Edison to develop a work plan (attached) which calls for revising the MCDA Area II and local plans and procedures by December 31, 1987. (He also noted that Massachusetts law requires annual revisions to the plans.) The revised plans will address the inadequacies noted by FEMA in the Self-Initiated Review and will be submitted for FEMA review as they are completed, allowing FEMA to close out each of the inadequacies noted in the Self-Initiated Review as quickly as possible. Mr. Agnes also requested someone from FEMA to work with them to ensure that they were on track with the revisions. FEMA indicated that they would probably be able to do that. Mr. Agnes indicated that they had recently been authorized \$175,000 as a supplemental budget for use in this area. Mr. Byrd stated that BECO is offering logistical support on the local level to correct the inadequacies identified, and that he has authorized BECO personnel to work 80 hours/week to support this effort. The logistical support includes funding of a civil defense director for those towns that want one.

The question of whether an exercise was necessary to close out the inadequacies was not resolved. It was agreed that for an exercise to be meaningful it should be conducted after the plans and procedures were revised and training completed. Pilgrim is required to conduct a full-participation exercise this year (tentative schedule is 11/5/87), unless they request an exemption.

On the issue of expanding the Pilgrim EPZ, a considerable change in the Commonwealth's position was noted. Their current position is to work with those communities who want additional planning, and to give them some support, but not to formally expand the EPZ (with full NUREG 0654 requirements applied to the additional area). A draft letter from R. Byrd to R. Boulay discussing their agreement on this issue is attached.


William J. L. O'Sullivan
Chief, Emergency Preparedness
Section, NRC RI